

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DEBBIE FISHER

Plaintiff,

vs.

NO. : 02-CV-3460

PEDRO ORTIZ, SHAN-LOR
TRUCKING EQUIPMENT,

Defendants,

and

PAUL LENAROSON

Additional Defendant.

**DEFENDANTS', PEDRO ORTIZ AND SHAN-LOR
TRUCKING EQUIPMENT, MOTION TO AMEND CAPTION**

Defendants, Pedro Ortiz and Shan-Lor Trucking Equipment, by and through their attorneys, Post & Schell, P.C., hereby move to Amend the Caption in this matter, and in support thereof aver as follows:

1. Plaintiff initiated this action by filing a Writ of Summons with the Philadelphia County Court of Common Pleas.
2. Plaintiff filed a Complaint on May 13, 2002.
3. On April 23, 2002, Defendants, Pedro Ortiz and Shan-Lor Trucking, filed a Praecipe to Issue Writ to join Paul Lenarosan as an Additional Defendant.
4. On May 30, 2002, Defendants, Pedro Ortiz and Shan-Lor Trucking, filed a Petition for Notice of Removal based on diversity of citizenship. However, Additional

Defendant, Paul Lenarosan's, name was inadvertently omitted from the caption on the Petition for Notice of Removal.

5. Paul Lenarosan should be included in the caption of this case because he was joined as an Additional Defendant prior to the case being removed to the United States District Court for the Eastern District of Pennsylvania.

WHEREFORE, Defendants respectfully request this Honorable Court grant their Motion to Amend Caption and enter the accompanying Order.

Respectfully submitted,

POST & SCHELL, P.C.

JOSEPH R. FOWLER, ESQUIRE
Attorney for Defendants, Pedro Ortiz
and Shan-Lor Trucking

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ORDER

AND NOW, this _____ day of _____, 2002, upon consideration of Defendants' Motion to Amend Caption, it is hereby **ORDERED** that said Motion is **GRANTED**, and the caption is amended to include the name of Paul Lenaroson as an Additional Defendant.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Motion to Amend Caption has been served on all interested parties listed below via first class mail, postage pre-paid on July 18, 2002.

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BY: _____
JOSEPH R. FOWLER, ESQUIRE
Attorney for Defendants

